

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	
)	
v.)	No. 1:24-CV-92
)	
ALLIANCE PARK LLC; BRICKYARD)	
PLACE LLC; CENTEX)	
MANAGEMENT, LLC; DEERWOOD)	
POINT LLC; HONEY PARK LLC;)	
MARIAH MARIE LLC; UNION GL)	
PARK LLC; GOVERNORS)	
MANAGEMENT LLC; and)	
THE PRUDENTIAL REALTY LLC;)	
)	
Respondents.)	
_____)	

CONSENT MOTION TO EXTEND DEADLINES

Respondents, Alliance Park LLC, Brickyard Place LLC, Centex Management, LLC, Deerwood Point LLC, Honey Park LLC, Mariah Marie LLC, Union GL Park LLC, Governors Management LLC, and The Prudential Realty LLC hereby move the court for a brief extension of the deadlines for compliance with the Court's Order dated March 11, 2025. [Dkt. 28]. In support of their motion, Respondents show the Court as follows:

- 1) On March 11, 2025, the Court granted the United States' Petition for

Summary Enforcement of Civil Investigative Demands (CIDs) and ordered Respondents appoint an agent to review documents and records in order to comply with the document requests and interrogatories contained in CIDs issued to each respective Respondent.

2) The Court ordered Respondents to comply with the CIDs and submit sworn certificates of compliance to the Government within 45 days of the Order, which would be April 25, 2025.

3) Respondents have appointed an agent to assist in responding to the CIDs as directed by the Court, and although diligent efforts have been made to fully respond, a brief extension is necessary to fully discharge Respondents' obligations.

4) Additionally, Respondents have raised potential issues with the language of the certificates of compliance with the Government, and the Parties have agreed to meet and confer in the hopes of resolving the dispute.

5) Accordingly, Respondents respectfully request an extension until May 5, 2025 to submit their responses to the CID interrogatories and documents requests.

6) Respondents' counsel has conferred with counsel for the Government Mr. Patrick, who consents to this request. Mr. Patrick is on a court approved leave of absence until May 5, 2025, thus the Government is not prejudice by this brief extension.

7) Upon Mr. Patrick's return on May 5th, the Parties have agreed to meet and confer regarding the language of the certificates of compliance within 14 days – or until May 19, 2025.

WHEREFORE, for the foregoing reasons, Respondents respectfully request that the Court grant their consent motion allowing an extension through and including May 5, 2025 to submit responses to the CID document requests and interrogatories and until May 19, 2025 to submit sworn certificates of compliance. Respondents have submitted a Proposed Order for the Court's consideration contemporaneous with this filing.

Respectfully submitted, this 25th day of April 2025.

CHILIVIS GRUBMAN

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Attorneys for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2025, I electronically filed the foregoing Consent Motion for Extension of Time with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

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